

BOARD OF DIRECTORS MEETING

New York, N. Y.

October 1, 1935.

A meeting of the Board of Directors of the Lead Industries Association was held on Tuesday, October 1, 1935, at 12:30 P.M., at the Town Association, New York City.

Present	Representing
Clinton H. Crane, Chairman	St. Joseph Lead Company
E. N. Zimmer	American Metal Co. Ltd.
F. H. Brownell	American Smelting & Refining Co.
H. M. Brush	American Smelting & Refining Co.
Clarence Glass	Anaconda Sales Company
A. E. Bendelari	Eagle-Picher Lead Company
W. F. Maston	Eagle-Picher Lead Company
F. M. Carter	National Lead Company
W. Y. C. Hunt	Reynolds Metals Company
F. Y. Robertson	United States Smelting Refining and Mining Co. Inc.
F. F. Wormser, Secretary.	

Mr. Clinton H. Crane occupied the chair.

The minutes of the previous meeting of June 13, 1935 were approved.

MEMBERSHIP STATUS

The Secretary reported that the Globe Metal Company, Alpha Metal & Rolling Mills, Inc., and Columbia Smelting and Refining Company were in arrears for periods of nine months to a year and nine months, and requested the advice of the Board as to the action which should be taken with these delinquent accounts.

It was moved, seconded and carried that the Secretary write the delinquent members, warning them that failure to pay their obligations to the support of the Lead Industries Association would likely lead to expulsion from membership.

RESOLUTION - DEATH OF GEORGE W. LAMBOURNE

The Chairman noted the passing of Director George W. Lambourne, President of the Park Utah Consolidated Mines Company, who died on August 2, 1935,

Whereupon the following resolution was presented and unanimously passed:

WHEREAS the untimely death of George W. Lambourne, a charter member and Director has deprived the Lead Industries Association of an outstanding leader, whose cooperation with his fellow directors, his unselfish and invariably helpful interest in the affairs of his industry has always been of the greatest value to his friends and colleagues

SECRETARY AND TREASURER'S REPORTS

The Secretary and Treasurer's Reports were read and accepted as follows:

SECRETARY'S REPORT

The following is a brief resume of the work of the Lead Industries Association since the last report:

1. Termination of Code Activities - Ever since the decision of the Supreme Court on the N.R.A., the Lead Industries Association has been winding up the affairs of the former Code Authority for the Lead Industry, liquidating its account, returning statistical reports to members, and storing code records in the office of the Lead Industries Association.

2. Tariff Legislation - Briefs were filed with the Committee for Reciprocity Information with reference to existing lead schedules in the negotiation of trade treaties with various countries, and with the help of various Western members, many Congressmen have been acquainted with the views of the Lead Industry. The Secretary understands a great many Congressmen have placed themselves individually and collectively on record with the State Department as opposed to any change in the lead rates. The Secretary had a chance to present the views of our industry to Dr. Francis Sayre, Assistant Secretary of State at the time we protested the reduction made in the white lead rate.

We recently received a communication from the State of Washington to the effect that Washington was becoming interested in tariff matters, and requesting our assistance in the accumulation of tariff data, which was gladly given.

3. Trade Promotion Activities -

(a) Plumbing Promotion - We have continued our plumbing promotion activities with two men in the field, one working in Eastern territory and the other with Chicago as a base. These men are almost constantly on the road in the interests of lead and it is largely owing to this field work that two more plumbers' associations have been added to the growing list of those which are actively advocating the greater return to the use of lead in plumbing systems. A complete list of plumbers associations, both master and journeymen, which have given lead this endorsement, are as follows:

<u>State</u>	<u>Association</u>
Illinois	Master Plumbers and Journeymen Plumbers
Indiana	Master Plumbers
Iowa	Master Plumbers
Kentucky	Master Plumbers
Maine	Master Plumbers
Massachusetts	Master Plumbers and Journeymen Plumbers
Michigan	Master Plumbers
New Jersey	Master Plumbers and Journeymen Plumbers
New York	Journeymen Plumbers
Ohio	Master Plumbers and Journeymen Plumbers
Pennsylvania	Master Plumbers
West Virginia	Master Plumbers
Wisconsin	Master Plumbers

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We exhibited at the National Convention of Master Plumbers in Chicago in June. Our display was witnessed by some 30,000 persons who attended the Convention. Every report indicates that our participation was very much worth while.

The lead plumbing goods manufacturers in the Association are studying the possibility of improving the usefulness of their product through further standardization which is hoped will eliminate inferior lead supplied which cause the industry considerable damage from time to time. The Lead Industries Association is also defending the interests of lead where the metal has been unjustly attacked by such organizations as Consumer's Research.

The only opposition encountered nowadays to the wider use of lead in plumbing systems comes from the Pacific Coast where, unfortunately, we have done no promotional work. It will probably be necessary to send one of our field men to the Coast for a few months in order to tell the lead story to the far Western plumber. Although we have a huge territory to serve with only two men engaged for the work, I believe that the progress we are making is satisfactory, particularly in the East, but it is slower in the Middle West.

The second edition of our booklet on LEAD PIPF and a display chart for plumbers is proving a valuable aid to our field men. Our magazine LFAD is also a great aid.

(b) Sheet Lead - We are continuing to accumulate data for our booklet on Sheet Lead. The re-roofing of the Rahway, N. J., Reformatory with lead, for which the Lead Industries Association is partly responsible, a job which displaces the use of copper, has given impetus to the use of lead in other installations, but judging from the ignorance which still prevails as to the proper method of installing the metal, an important bit of educational work remains to be done in the sheet lead field. I believe that the future of sheet lead is bright but it is necessary for efforts to be made acquainting prospective users with the advantages of sheet lead and the ease of its application. Our work will help to do this.

(c) Forest Products-Better Paint Campaign - This Campaign has recently also received the endorsement of the Southern Cypress Association so that it now possesses the support of practically all the important lumber associations in the United States. The best evidence of its progress is the fact that the prepared paint industry is trying to find a common ground in which it can also cooperate with the lumber companies and ourselves in accomplishing the objectives of the Forest Products - Better Paint Campaign. Mr. Critchfield, field representative of the work, has spent the entire summer in the Northwest, visiting the regional lumber associations, executives of the principal saw mills, retail lumber yards and has been holding meetings with sales groups of our members interested in the sale of white lead. He reports that interest is still high in the Campaign on the part of all the lumber people interviewed. Many lumber yards are putting white lead on their retail shelves where they never sold it before and some leadless paints, formerly sold as a high quality product, are now including lead. This Campaign recommends either white lead in oil or the highest grade prepared paint.

4. Publicity - The Lead Industries Association staff has of late been contributing and preparing numerous articles on lead and its derivatives, among them being a Chapter on Lead for the Handbook of the American Society for Steel Treating, an address on New and Old Uses of Lead for the American Mining Congress, an article on the Use of Lead in the Mining Industry for the American Institute of Mining and Metallurgical Engineers, an article on Use of Lead for Chemical Industry for "Chemical Industries", an article for the "American Artisan" and the "Sheet Metal Worker" on the Use of Sheet Lead in Building Construction, the History of Lead for "Carbon Fuel News".

5. Lead Poisoning - There has been no let up in the amount of attention given by the health writers to the subject of lead poisoning and this problem still remains one of great importance to us. The Harvard Medical School is continuing its research on lead and we have supplied them with \$6,000 of the \$10,000 appropriation covering their two year's experimentation.

Respectfully submitted,



Secretary.

Treasurer's Report

January 1, to August 31, 1935.

Cash on Hand and in Bank, January 1, 1935 \$7,015.39

Receipts

Membership Contributions, 1934

Ordinary Fund \$ 796.00
Plumbing Promotion 7,986.25

Membership Contributions, 1935

Ordinary Fund 30,190.25
Forest Products - Better
Paint Campaign 10,350.00
Plumbing Promotion 11,387.50
Paid in Advance 87.50

Reimbursement by Code Authority

3,663.53 \$64,461.03

Less: Contributions Paid in

Advance, January 1, 1935. 493.75

Outstanding Contributions 749.00

1,242.75

TOTAL RECEIPTS

63,218.28

TOTAL

\$70,233.67

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Treasurer's Report (Continued)

Disbursements

Ordinary Disbursements:

Furniture, Fixtures & Equipment	\$16.16	
Salaries	10,550.65	
Rent and Light	1,290.18	
Office Expense Miscellaneous	865.71	
Traveling Expenses	708.31	
Telephone and Telegraph	331.79	
Books and Subscriptions	155.33	
Printing	2,615.31	
Mailing	1,839.11	
Illustration	<u>234.36</u>	\$18,606.91

Plumbing Promotion:

Salaries	3,450.00	
Traveling Expenses	2,956.51	
Mailing	252.77	
Printing	1,335.64	
Advertising	720.14	
Miscellaneous	<u>1,373.67</u>	10,088.73

Forest Products - Better Paint Campaign:

Salaries	3,325.00	
Traveling Expenses	2,859.88	
Printing	323.87	
Mailing	237.31	
Miscellaneous	<u>1,942.60</u>	8,688.66

Medical Research

3,000.00

Additional Advances for Traveling Expenses

75.00

Advanced to Code Authority

1,713.37

TOTAL DISBURSEMENTS

\$42,172.67

Cash on Hand and in Bank, August 31, 1935.

28,061.00

\$70,233.67

CORRESPONDENCE - DIVISION OF REVIEW, N.R.A.

The Chairman called the attention of the Board to the receipt by the Secretary, of a letter dated August 27, 1935, from Dr. L. C. Marshall, Director of the Division of Review of the National Recovery Administration, as follows, which had been previously circulated to the members of the former Code Authority:

C O P Y
NATIONAL RECOVERY ADMINISTRATION
Washington, D. C.

August 27, 1935.

Lead Industry Code Authority
420 Lexington Avenue
New York, N. Y.

Gentlemen:

In an Executive Order dated June 15, the President established within the National Recovery Administration the Division of Review. This division is to assemble, analyze and report upon experiences of N.R.A. and codified industry. The fundamental purpose is that of sharpening issues for the guidance of future policy. There is here a basis of a substantial service to industry.

Among the activities in the Review Division is that of preparing a COMPREHENSIVE HISTORY of the formulation and operation of each code. A part of this work is now being performed by our deputies on the basis of a standard outline, a copy of which is enclosed for your information.

I need hardly point out that this material which is being prepared by our deputies would be greatly enriched if there could be inserted in the history a statement coming from the industry itself; and, of course, the appropriate person to prepare such a statement is an official of the code authority. It would seem to me that, along with other material which might properly vary from case to case, there should be a nucleus which would be the same in all the industry statements. This nucleus might well include, without limitation of either subject matter or space taken, the following:

1. The principal problems confronting your industry before the adoption of the code.
2. The degree of success, or failure, of the code in meeting these problems; with discussion of causes.
3. Difficulties encountered in organizing for code administration, and how these were met.
4. Difficulties encountered in securing compliance with code provisions, and how and to what extent these were met.
5. Difficulties encountered in financing code administration and how and to what extent these were met.
6. The strong and weak features of the NRA administration of codes, as specifically exemplified in your industry.

I earnestly hope that in this matter of such vital interest, I may have your cooperation. I am sure a real service can be rendered.

Very truly yours,

Signed: L. C. Marshall
Director, Division of Review

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Numerous suggestions for an appropriate reply having been received, the Secretary was finally instructed to dispatch the following answer:

October 2, 1935.

Mr. L. C. Marshall, Director
Division of Review
National Recovery Administration
Washington, D. C.

Dear Sir:

Pursuant to your letter of August 27, I have conferred with the members of the former Code Authority for the Lead Industry and submit the following information which I hope will be useful to you in your survey.

At the time the National Industrial Recovery Act was adopted, the lead industry was in a depressed condition due almost wholly to the greatly reduced consumption of lead and lead products by the consuming industries. The price of lead was low, due to the fact that lead is a basic world commodity and the price of lead in the United States follows the world lead price with a differential determined by the United States tariff on lead. The world price for lead was likewise low, due to decreased world consumption of lead and lead products. In the domestic market, price cutting, unfair trade practices, etc., were either absent or of relatively little importance.

Some lead mines in the United States felt compelled to shut down, due to the low price of lead. Certain other companies continued to operate at reduced rates of production in order to give employment to their employees, even though this continuation of operations resulted in the tying up of large amounts of money in stocks of refined lead which could not be marketed. The employees in general appreciated this action on the part of these companies and there was little or no unrest among employees, the principal complaint heard being of the fact that they could not work full time. Wages, while below the 1929 peak, were on a reasonable and fair basis. Conditions in the manufacturing divisions of the industry were quite similar to those in the mining division.

In general, the members of the lead industry were not of the opinion that a code under the National Industrial Recovery Act would materially help the lead industry but pursuant to urgent representations by National Recovery Administration officials, steps were taken to draft a code for the industry. While this code was being drafted, the President's Re-employment Agreement was promulgated and this Agreement as modified for the lead industry, was subscribed to by most of the members of the lead industry. The Lead Code as finally approved was essentially an enlargement of the President's Re-employment Agreement as modified for the lead industry with fair trade practices included for three of the manufacturing divisions of the industry, namely, the Pigment, Metallic Lead Products and Foil Divisions.

No difficulties were met in organizing for the drafting of the code, in organizing for code administration or in financing code administration. There were practically no complaints of code violation and the principal duty of the Code Authority was in connection with the interpretation of code provisions and in attempting to secure National Re-

covery Administration approval of such interpretations as were in line with long standing usages in the lead industry.

The concensus of opinion of the former Code Authority members, who obviously reflect the opinions of the members of the lead industry, is that the lead code under the National Industrial Recovery Act accomplished little or nothing of value for the lead industry. On the contrary, it increased costs of production of lead and lead products, making for decreased consumption of these materials. Such statistics as were collected by the Lead Code Authority under the National Industrial Recovery Act were of no value to the lead industry, the industry being adequately served by the Lead Industries Association, a voluntary, non-profit organization composed of producers and consumers, by government organizations such as the United States Bureau of Mines, United States Geological Survey, etc., and by the American Bureau of Metal Statistics.

The lead code was essentially a labor code but the effect of the code on labor was relatively small, wages in the industry having in general been above the N.R.A. minima for similar employments and hours in general within eight per day. While some employees in the industry were on a seven-day schedule prior to the N.I.R.A., the great majority had been on part time. Not only did the latter remain on part time after the adoption of the lead code but in addition, the possible working time of many of these part time employees was further cut by various rules and regulations of the National Recovery Administration. In the attempt to fit all industries into much the same mold as far as labor regulations were concerned, the National Recovery Administration made restrictions, rules and interpretations which violated established customs in the industry, which customs were accepted and desired by the employees and were satisfactory to the employers, thus causing a certain amount of dissatisfaction and unrest among employees without doing any good to anyone.

With the above facts in mind, the former members of the Lead Code Authority feeling that neither labor nor industry benefited through the operation of the lead code, would not be favorably inclined to the formation of a new code or the continuance of the old.

Yours very truly,

Signed: F. E. Wormser

Secretary.

CORRESPONDENCE - COMMITTEE TO REPORT ON CHANGES
IN LABOR AND TRADE PRACTICE STANDARDS

The Chairman also reported the receipt of a letter from the Committee to Report on Changes in Labor and Trade Practice Standards of the N.R.A., dated September 28, 1935, as follows:

COMMITTEE TO REPORT ON CHANGES IN LABOR AND TRADE PRACTICE STANDARDS
Commerce Building
Washington, D. C.

September 28, 1935.

Mr. F. E. Wormser
Lead Industries Association
420 Lexington Avenue
New York, N. Y.

Dear Sir:

In accordance with the President's instructions, a Committee has been appointed to collaborate with the National Recovery Administration to make an independent survey of the changes in labor and trade practice standards that are resulting from the termination of the codes. For this purpose, the Committee is obtaining from a large number of firms, of each of a large number of representative industries, data in regard to such changes as have occurred since May 27, 1935 (the date of the Supreme Court decision in the Schechter case). This data covers both labor conditions and trade practice conditions and is being secured from employees as well as from employers.

The Committee desires to secure factual data on this subject as far as practicable from all available sources that can supply helpful information, so that a true and correct picture may be formed as to the trend of such matters resulting from the abolition of the codes.

With this object in view, the Committee would be pleased to receive from you a statement covering, in general, the degree to which you find there has been, since May 27, 1935, departure from the provisions that were formerly embodied in the codes. It is desired that your answers cover the following questions:

1. Have hourly wages decreased since May 27, and if so, to what extent?
2. Have hours of employment been increased since May 27, and if so, to what extent?
3. If you know of any other provisions of former codes (either in labor or in trade practice standards) that are being departed from, brief description of same is requested.

Please address your reply to "The Chairman, Committee to Report on Changes in Labor and Trade Practice Standards, Commerce Building, Washington, D. C.," using the self-addressed envelope enclosed herewith.

Very truly yours,

Signed: W. P. Robert
Chairman.

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October 1, 1935.

to which the Secretary was requested to reply, as follows:

October 8, 1935.

Dear Mr. Robert:

Replying to your form letter of September 28, as to the degree to which there has been a departure from code provisions since May 27, 1935, I shall try to answer your questions in the order in which they are asked.

1. Although I am not fully cognizant of the labor situation as it affects all our members, owing to the fact that, since the termination of our Code, labor data have been returned to our members and have not been kept up, I believe it is fair to state that there have been no decreases in wages since May 27, 1935 among our members. If there have been any at all, they have been negligible. As a matter of fact, wages have actually been increased by mining companies in Utah and Idaho and by some smelting and refining companies.

2. So far as I know, hours of employment have been unchanged and the only substantial deviation from code practice has been to use the averaging of hours, at the insistence of employees who favor this practice. In other words, I believe that code labor hours and wages are substantially observed as they appear in the Code.

3. Inasmuch as trade practice provisions were only provided for three divisions of our industry and were of a general nature, and inasmuch as there were practically no violations during the life of the code, it is reasonable to expect, and as a matter of fact I have heard of, no violations since May 27, 1935.

Very truly yours,

Signed: F. E. Wormser

Secretary.

CORRESPONDENCE - W.A.JANSSEN, N.R.A.

The Secretary reported that he had received a telephonic request from Mr. W. A. Janssen, of the N.R.A., who stated he was writing a history of the codes under his administration and that he desired information as to the reasons for requesting the suspension of Section 2 of Article VII of the Lead Code, and data as to the value of the lead products produced by the four divisions of the Lead Code. Upon advice of the Board, the Secretary mailed Mr. Janssen letters, as follows:

October 1, 1935.

Mr. W. A. Janssen
Hotel Occidental
Washington, D. C.

Dear Mr. Janssen:

Answering your telephone query as to the reason for the suspension in the operation of Section 2 of Article VII of the Lead Code, you will recall the history of this particular section.

The Pigments Division had mixed feelings from the start about the advisability, or need, of incorporating an open price provision in the Code. The Section was included only, I think it fair to state, at the insistence of N.R.A., which strongly endorsed the proposal. Upon approval of the Code, however, the Pigments Division felt that the lukewarmness of some members made it desirable to postpone the establishment of this practice and to request a suspension, until full agreement had been reached.

Very truly yours,

Signed: F. F. Wormser
Secretary.

October 1, 1935.

Mr. W. A. Janssen
Hotel Occidental
Washington, D. C.

Dear Mr. Janssen:

In response to your telephonic request, as to the value of certain lead products produced in the United States during 1933, specifically (1) pig lead, (2) lead pigments, (3) metallic lead products and (4) metallic foil products, as defined by the Lead Code, I am pleased to give you the following data:

VALUE OF PRODUCTION

1933 Pig Lead (Primary and Secondary)*	\$34,552,000
1933 Lead Pigments (White lead, Basic lead sulphate, litharge, red lead, orange mineral)**	20,820,000
1931 Metallic Lead Products:	22,620,000
Antifriction Bearings	\$3,783,000
Solder	10,166,000
Type Metal	3,538,000
Sheet Lead	2,227,000
Lead Pipe	2,906,000

1931 Metallic Foil Products (Lead, tin, aluminum and composition.)

12,226,000

*From American Bureau of Metal Statistics and Lead Industries Association.
**From data of U. S. Bureau of Mines. data.

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The Pig Lead and Lead Pigment estimate covers the year 1933 whereas the Metallic Lead Products and Metallic Foil Products estimates cover the year 1931, the latest available from Census reports.

In addition to the products shown in the Metallic Lead Products classification, there are numerous other commodities which are included in that broad segregation but data are not available showing the value of the products manufactured.

Moreover, in the Foil tabulation the values shown include aluminum foil which was not covered by the Lead Code. With these two reservations in mind I think the table above gives you as close an estimate as you may reasonably expect. It goes without saying that the value of the manufactured products listed in the above tabulation includes a certain amount of value which is derived from the value of the raw material from which those manufactured products were made.

Very truly yours,

Signed: F. E. Wormser

Secretary.

The meeting adjourned at 2:30 P.M.



Secretary.

LIAC0169

July 18, 1935

SCOPE OF THE STUDIES UNDER THE DIVISION OF REVIEW

The Division of Review has the research task of assembling and analyzing the NRA experiences with codified industry. The analysis will be made in terms of the whole business setting.

All told, 576 codes were approved (a total of 777 codes, and supplements) and data of varying degrees of comprehensiveness with respect to the economic characteristics, trade organization, and governmental relationships of all these industries under codes are in the NRA files. In many respects it is a rich and unique body of material.

The Studies, of which there will be a large number, may be classified into the following major groups:

1. Industry Studies: analyses of the functioning structure of some 22 major industries. This includes a great number of codes.
2. Trade Practice Studies: a comprehensive analysis of the trade practices dealt with by codes. These studies sweep through all industries covered by codes, including those referred to in the preceding paragraph.
3. Labor Studies: analyses of hours, wages, general conditions of labor, and labor legislation in relationship to codified industry.
4. Foreign Trade Studies: with particular references to the inter-relationships of codified industry and foreign trade.
5. Legal Studies: with particular reference to the legal and administrative issues connected with efforts to regulate industry and efforts of industry to regulate itself.
6. Code Administration Studies: analyses of the experiences of government and business in the actual administration of the codes.
7. NRA Organization Studies: analyses of the development and structure of the NRA organization and of its functioning as an administrative agency.

LIA00160

OUTLINE FOR GUIDANCE OF DEPUTIES IN PREPARING CODE HISTORIES

I. General Information

(To be primarily references to location of materials; very brief).

- A. Definition of the industry.
 - 1. Principal products.
 - 2. Products also under other codes.
- B. Definition of industry member.
 - 1. Classes of members.
- C. Statistics of the industry (salient only).
 - 1. References to material within or outside NRA.

II. History of code formulation.

(To be brief - not over 2 or 3 pages - with complete reference to documents).

- A. Sponsoring organization(s).
 - 1. Statements re true representation, age, code meetings, et cetera.
 - 2. Officers, code committees, interested groups.
- B. From submission of first draft code to public hearing.
 - 1. Brief summary of conferences and negotiations.
- C. Public hearing(s) on code.
 - 1. Dates; major personnel; results.
- D. From public hearing to approval.
 - 1. Brief summary of post-hearing conferences.
 - 2. Activities in obtaining approval, to include copies of review, answers, memoranda on disputed points, discussion of method and degree of industry assent.
 - 3. Date of approval.
 - 4. Conditions in order of approval; industry reaction.

III. Code Administration.

(To be detailed, with complete documentation either by reference or copies of essential documents)

- A. General preliminary discussion of the period of code administration, covering general success of code, or lack of success, chief difficulties encountered, extent of compliance or non-compliance; to include a general orientation for the subsequent discussion.
- B. Organization.
 - 1. Method of organization of the code authority; dates.
 - 2. Personnel of code authority; names, addresses, company, association or group affiliation, geographical or other representation. Meetings
 - 3. Changes in code authority.
 - 4. Agencies of the code authority; describe their activities, personnel and functioning.
 - a. Local
 - b. Compliance
 - c. Statistical
 - d. Other
 - 5. Field organization, as distinct from local agencies.
 - a. Operation and accomplishments.
 - 6. Discussion of operation of the code authority as an industry governing body, including successes, failures, difficulties, and a general estimate of value.

- C. Budgets and Bases of Assessment.
 - 1. Budgets as submitted and as approved.
 - 2. Termination of Par. 3, A.O. X-36.
 - 3. Effect of other administrative orders.
 - 4. Income from labels.
 - 5. Proportion of assessments collected.
 - a. Discussion of difficulties involved, certificates of non-payment, protests and actions taken. (Coordinate with Compliance Div.)
 - 6. Discussion of financial operations of code authority in relation to its other operations.
- D. Administration of code.
 - 1. Amendments. Discuss and document fully all negotiations, submittals, changes and approvals, including difficulties - substantive or procedural - in obtaining approval.
 - a. Effect on the industry.
 - b. Critical discussion of value of amendments, including unapproved amendments.
 - 2. Interpretations.
 - a. List and document fully.
 - b. Effect on industry.
 - c. Critical discussion of value.
 - 3. Exemptions and stays.
(Do not list unless there were so few that they may be cited in relatively small space.)
 - a. Discussion of kinds, number, and general effect on persons exempted and remainder of industry.
 - 4. Other administrative actions and agencies.
 - a. Trade practice complaints committees.
 - 1. Organizations and activities.
 - b. Labor complaints committees.
 - 1. Organization and activities.
 - c. By-Laws.
 - 1. Approval date; changes; operation.
 - d. Other
 - 5. Other phases of code administration not covered above.

IV. Operation of code provisions.
(Elaborate fully.)

- A. Definitions.
 - 1. Overlapping; discuss steps taken to adjust; recommendation as to possible means of correcting in future.
- B. Wages.
 - 1. Effect of code on industry wage levels; minima, average.
 - 2. Industry compliance.
 - 3. Skilled wages in codes.
 - 4. Adjustment of wages above the minimum.
 - 5. Mal-adjustment with other industries. (Treat other pertinent subjects fully.)
- C. Hours.
 - 1. Effect of code on industry.
 - 2. Effect of tolerances, peak-period provisions, various differentials.
 - 3. Industry compliance.
 - 4. Mal-adjustment with other industries. (Treat other pertinent subjects fully.)

- D. Other labor provisions.
 - 1. Child labor.
 - 2. Home workers.
 - 3. Handicapped workers.
 - 4. Apprentices and learners.
 - 5. Other miscellaneous labor provisions.
- E. Administrative provisions.
 - 1. Investigation of records.
 - 2. Collection of statistics; confidential agency.
 - 3. Liquidated damages.
 - 4. Other.
- F. Price and accounting provisions.

(A full discussion of the operation of these provisions is desired, particularly as to their known effect on various classes of industry members from the viewpoint of Section 1 of the Act)

 - 1. Price filing.
 - a. Waiting periods.
 - 2. Emergency price bases.
 - 3. Accounting systems or cost systems.
 - 4. Classification of customers.
 - 5. Price differentials.
 - a. Stop-loss provisions.
 - 6. Terms of payment.
 - 7. Cooperatives.
 - 8. Other provision relating to prices or terms.
- G. Trade practices.
 - 1. Class A trade practices.

(Those fully established by adjudication or F. T. C. orders.)

 - a. Discussion of their efficacy, effect on various classes in the industry, and actions under them.
 - 2. Class B trade practices.

(All other than Class A.)

 - a. Discussion of their efficacy, effect on various classes in the industry, and actions under them.
- H. Other provisions.
 - 1. "Hedge" clause.

V. Recommendations

A full and frank discussion of the code as a whole, with particular reference to the following:

- A. Undesirable or unenforceable provisions.
- B. Compliance with code.
- C. Limitations on production, machinery, shifts, et cetera.
- D. Possible code consolidations.

VI. Personnel

List of NRA personnel connected with the code from its first submittal to date, to include division administrators, deputies, assistant deputies, technical advisers, aides and advisers, showing period of connection of each.

VII. Index.

(Very complete)